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By email only to: [Paul.Thompson@stratford-dc.gov.uk](mailto:Paul.Thompson@stratford-dc.gov.uk)

16 January 2023

Dear Paul,

**APPLICATION NO:** 22/02880/FUL

**DESCRIPTION:** External refurbishment and change of use from C3 to F1 (learning and non-residential institutions), together with replacement of existing barn with a multi-functional space for up to 40 pupils

**LOCATION:** The Thatch, London Road, Kitebrook, Little Compton, Warwickshire

Thank you for consulting the Cotswolds National Landscape Board<sup>1</sup> on this proposed development, which would be located within the Cotswolds National Landscape<sup>2</sup>.

In reaching its planning decision, the local planning authority (LPA) has a statutory duty to have regard to the purpose of conserving and enhancing the natural beauty of the National Landscape.<sup>3</sup> The Board recommends that, in fulfilling this 'duty of regard', the LPA should: (i) ensure that planning decisions are consistent with relevant national and local planning policy and guidance; and (ii) take into account the following Board publications<sup>4</sup>:

- Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023 ([link](#));
- Cotswolds AONB Landscape Character Assessment ([link](#)), particularly, in this instance, with regards to the 'key features / characteristics' of Landscape Character Type (LCT) 17 (Pastoral Lowland Vale);
- Cotswolds AONB Landscape Strategy and Guidelines ([link](#)), particularly, in this instance, with regards to LCT 17 ([link](#)), including Section 17.2;
- Cotswolds Conservation Board Position Statements ([link](#)), particularly, in this instance, with regards to the:
  - Tranquillity Position Statement ([link](#)); and
  - Dark Skies and Artificial Light Position Statement ([link](#)) and its appendices ([link 1](#), [link 2](#), [link 3](#)).

Having reviewed the application including the supporting reports and surveys, for the reasons outlined in Annex 1 below we would like to raise a **holding objection** and request further information to assist our assessment of any potential adverse impacts of the proposal on the Cotswolds National Landscape. Further detail is provided in the Annex below.

The submission of the further information requested below will allow the Board to draw a more definitive conclusion on the potential impacts of the scheme and whether, in our view, the application complies with the requirements of national and local planning policy and guidance.

#### Cotswolds Conservation Board

The Old Prison, Fosse Way, Northleach  
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[info@cotswoldsaonb.org.uk](mailto:info@cotswoldsaonb.org.uk)

The Cotswolds National Landscape is a designated Area of Outstanding Natural Beauty (AONB), managed and looked after by the Cotswolds Conservation Board.

[cotswoldsaonb.org.uk](http://cotswoldsaonb.org.uk)

Chairman:  
**Brendan McCarthy**  
  
Vice Chair:  
**Rebecca Charley**

Please don't hesitate to contact me if you wish to discuss this response further.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'S. Joyce'.

Simon Joyce

**Planning Officer**

[simon.joyce@cotswoldsaonb.org.uk](mailto:simon.joyce@cotswoldsaonb.org.uk) | 07808 391227

## **ANNEX 1. COTSWOLDS NATIONAL LANDSCAPE CONSULTATION RESPONSE IN RELATION TO PLANNING APPLICATION 22/02880/FUL**

The application proposes the change of use of 'The Thatch', which currently falls into use class C3 (residential) though which has not been occupied for some time, to F1 teaching space. It also seeks permission for the demolition of a dilapidated barn and its replacement with a new multi-functional teaching building. This new building would have a 43% larger footprint (43m<sup>2</sup> compared to 30m<sup>2</sup>) than the current barn with a ridge height in excess of a metre higher.

Whilst the Board does not object to the change of use of 'The Thatch' and indeed, would support its reuse, we have concerns regarding the design of the multi-use building and the lack of supporting ecological assessment of both of the existing buildings.

### **Lighting and design of the multi-use building**

Dark skies are one of the 'special qualities' of the Cotswolds National Landscape and the applicant is encouraged to refer to the Cotswolds National Landscape Board's guidance in relation to artificial light and dark skies contained in our Dark Skies and Artificial Light Position Statement (and its appendices) referred to above.

Paragraph 185c of the NPPF states that planning decisions should ensure that new development is appropriate for its location and in doing so they should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. Paragraph 001 of the Planning Practice Guidance (PPG) on Light Pollution (Paragraph: 001 Reference ID: 31-001-20191101) states that 'intrinsically dark landscapes' are those entirely, or largely, uninterrupted by artificial light. National parks ... can serve as good examples'. As AONBs have the same level of protection with regards to landscape and scenic beauty as national parks within the NPPF and PPG and dark skies are one of the special qualities of the Cotswolds National Landscape, we consider it reasonable to treat the National Landscape as an 'intrinsically dark landscape' in NPPF and PPG terms.

Paragraph 176 of the NPPF requires 'great weight' to be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. Policy CS.11 of the Core Strategy states that the minimisation of light pollution within the National Landscape is a priority whilst Policy CE5 'Dark Skies' of the AONB Management Plan states that proposals that are likely to impact on the dark skies of the Cotswolds National Landscape should have regard to these dark skies, by seeking to (i) avoid and (ii) minimise light pollution. Measures should be taken to increase the area of dark skies in the Cotswolds AONB by (i) removing and (ii) reducing existing sources of light pollution.

Section 17.2 of the Cotswolds AONB Landscape Strategy and Guidelines for Landscape Character Type 17 (Pastoral Lowland Vale), within which the site is located, identifies the 'introduction of lit elements into characteristically dark landscapes' as a potential adverse landscape implication.

We note that almost the entire western and eastern elevations of the multi-use space would be glazed with three further rooflights proposed on the northern elevation. Louvres are proposed for the western end, but not the eastern end. The potential for light spill and glow from these areas, including upwards spill and glow from the rooflights is a concern. Chapter 9 of The South Downs

National Park Dark Skies Technical Advice Note ([link](#), page 44), which is considered by National Park Authorities and AONB Boards to comprise best practice for protected landscapes in relation to this issue, advises that large (>50% on a single elevation) single areas of glazing should be avoided in protected landscapes.

No information has been provided on external lighting for both The Thatch and the proposed new building, but it is assumed that some would be required to enable safe access after dark, particularly during winter.

Accordingly, we would welcome confirmation from the applicant as to any external lighting proposals and recommend that the new multi-functional building is redesigned to remove the rooflights and reduce the glazed area. The impact of the new building could also be reduced by a reduction in its size as we would question whether the new building would remain subservient to The Thatch in the same manner as the current barn given the increase in footprint compared to the current barn and the increased ridge height.

The applicant should also demonstrate that the proposal complies with Guidance Note 01/21 on The Reduction of Obtrusive Light, published by the Institution of Lighting Professionals (ILP) (which forms Appendix 2 of our Position Statement on Dark Skies and Artificial Light referenced above) and other relevant guidance. We would recommend that the relevant 'environmental zone' for which compliance should be assessed is Environmental Zone E1 which relates to AONBs.

## **Biodiversity**

Natural heritage (including biodiversity) is one of the factors that contribute to the natural beauty of the National Landscape. We note that no ecological surveys have been provided in support of this application and given the nature and current state of the buildings, we consider that an ecological assessment and, if required, surveys confirming the presence or absence of protected species should be carried out to ensure that biodiversity and protected species are adequately considered. We also note the response of the Council's Ecologist querying this.

## **Recommendation**

In conclusion, we would request that the applicant provides the following further information to allow us to fully assess the potential impacts of the proposal on the AONB and to draw a more definitive conclusion on the potential impacts of the scheme and whether, in our view, the application complies with the requirements of national and local planning policy and guidance:

- A consideration of the potential dark skies impacts in relation to the AONB and
- Ecological assessment and protected species surveys as required.

Notwithstanding our holding objection and without prejudice, should the Council be minded to grant planning permission, we would recommend conditions to require pre-commencement submission of detailed lighting plans, ecological assessment and the necessary protected species surveys in the interest of the conservation and enhancement of the landscape and scenic beauty of the Cotswolds National Landscape.



## NOTES:

- 1) The name used for the organisation associated with the AONB designation is the Cotswolds National Landscape Board. At times this is abbreviated to National Landscape Board or The Board. The legal name of the organisation remains the Cotswolds Conservation Board but this name is no longer used in most circumstances.
- 2) Cotswolds National Landscape is the new name for the Cotswolds Areas of Outstanding Natural Beauty (AONB). The new name takes forward one of the proposals of the Government-commissioned 'Landscapes Review' to rename AONBs as 'National Landscapes'. This change reflects the national importance of AONBs and the fact that they are safeguarded, in the national interest, for nature, people, business and culture.
- 3) Section 85 of the Countryside and Rights of Way Act 2000.  
[www.legislation.gov.uk/ukpga/2000/37/section/85](http://www.legislation.gov.uk/ukpga/2000/37/section/85)
- 4) The documents referred to in our response can be located on the Cotswolds National Landscape website under the following sections
  - a. Cotswolds Area of Outstanding Natural Beauty (AONB) Management Plan 2018-2023  
[www.cotswoldsaonb.org.uk/management-plan](http://www.cotswoldsaonb.org.uk/management-plan)
  - b. Cotswolds AONB Landscape Character Assessment  
[www.cotswoldsaonb.org.uk/lca](http://www.cotswoldsaonb.org.uk/lca)
  - c. Cotswolds AONB Landscape Strategy and Guidelines  
[www.cotswoldsaonb.org.uk/lsg](http://www.cotswoldsaonb.org.uk/lsg)
  - d. Cotswolds AONB Local Distinctiveness and Landscape Change  
[www.cotswoldsaonb.org.uk/ldlc](http://www.cotswoldsaonb.org.uk/ldlc)
  - e. Cotswolds Conservation Board Position Statements  
[www.cotswoldsaonb.org.uk/ps1](http://www.cotswoldsaonb.org.uk/ps1)  
[www.cotswoldsaonb.org.uk/ps2](http://www.cotswoldsaonb.org.uk/ps2)